Atty Docket No. 336001-2021

REMARKS

Claim 14 has been cancelled. All now pending and previously examined claims except claims 20, 23, 26-28, 32 and 52 have been amended. New claims 56-61 have been added. Claim 14 has been cancelled. Claims 2, 4–13, 16–36, 38-40, 46–54 and new claims 56-61 are pending and presented for examination following entry of this amendment.

Objection to Claims

Claim 14 has been cancelled in response to the objection that claims 13 and 14 are substantial duplicates.

35 U.S.C. §101 Rejections

All pending claims were rejected in the October 20, 2006 Office Action under 35 U.S.C. § 101 as being directed to non-statutory subject matter, specifically, as directed to an abstract idea.

Applicants traverse this rejection as applied to the claims rejected in the October 20, 2006 Office Action and as the rejection may be applied to the claims presented herein. Applicants in this section address the rejection under § 101. Patentability under §§ 102 and 103 is addressed below. Consistent with the practice described in the *MPEP*, the Examiner is similarly respectfully requested to consider whether the claims satisfy §101 in view the arguments in this section, and claim amendments, before determining patentability under §§ 102 and 103 in view of the arguments presented further below and claim amendments. In this regard, MPEP ¶ 2106.01 points out that USPTO personnel, in determining whether any claimed nonfunctional descriptive material be given patentable weight, must consider all claim limitations when determining patentability of an invention over the prior art. In the §101 analogous area of printed matter, *MPEP* ¶ 2106.01 states:

> USPTO personnel may not disregard claim limitations comprised of printed matter. See Gulack, 703 F.2d at 1384, 217 USPQ at 403; see also Diehr, 450 U.S. at 191, 209 USPQ at 10. However, USPTO personnel need not give patentable weight to printed matter absent a new and unobvious *functional* relationship between the printed matter and the substrate. See In re Lowry, 32 F.3d 1579, 1583-84, 32 USPQ2d 1031, 1035 (Fed. Cir. 1994); In re Ngai, 367 F.3d 1336, 70 USPQ2d 1862 (Fed. Cir. 2004). (Emphasis supplied.)

The Office Action refers to *MPEP* ¶2106 IV.B.2, which discusses the enumerated categories of patentable subject matter recited in § 101, and states that the claimed subject matter is directed to non-statutory subject matter, specifically, as directed to an abstract idea. As discussed in more detail below, each independent claim is directed to a product or manufacture (a computer readable medium), or a system, or a method, which, of course, are all enumerated categories under § 101. In addition, each claim claims a computer readable medium product comprising data structures comprising specific functional relationships, or a system or method that provides a useful, concrete and tangible result. Therefore, for the reasons discussed below, all of the pending independent claims are directed to § 101 statutory subject matter.

MPEP ¶ 2106.01 II points out that mere arrangements or compilations of facts or data, without any functional interrelationship, does not constitute a statutory process, machine, manufacture or composition of matter. However, it is submitted that the elements of the claims that claim a computer readable medium, as previously examined and as presented herein, have functional relationships that render the claims statutory under § 101.

For example, claim 2 as previously examined, claimed "temporal information stored in association with respective parts of the body of law and comprising one or more dates indicating the legal applicability of the respective part of the body of law," "a plurality of topics each having associated therewith at least one part of the body of law and including information relating to the at least one part of the body of law" and "at least one of the topics having associated therewith a plurality of parts of the body of law that are different versions of each other and have different temporal information associated therewith." Figs. 3 and 5 of the application illustrate two embodiments of the invention with the relationships claimed in claim 2. Thus, various elements of claim 2 have the functional relationship described in the MPEP. It is submitted that all of the other pending independent claims that recite a computer readable medium (4, 29, 30, 31, 36, 46, 47, 50 and 51) also have a functional relationship as described in the *MPEP*.

Independent claims 2, 4, 29, 30, 31 and 36, which claim a computer readable medium (a "manufacture" within the enumerated statutory classes in § 101) encoded with one or more data structures, as amended include various associations of data. *See. e.g.,* the embodiments depicted in Figs. 3 and 5 of the application. The subject matter claimed in these claims is not nonfunctional descriptive material such as music, literature, art, photographs, or *mere*

arrangements or compilations of facts or data *without* any functional interrelationship. (*MPEP* 2106.01 II) The subject matter of these claims also is not directed to an abstract idea. Instead, these claims claim a computer readable medium encoded with one or more data structures[1], and claim various functional relationships for information represented by the one or more data structures. As described in *MPEP* ¶ 2106.01 I:

> Data structures not claimed as embodied in computer-readable media are descriptive material *per se* and are not statutory because they are not capable of causing functional change in the computer. See, e.g., *Warmerdam*, 33 F.3d at 1361, 31 USPQ2d at 1760 (claim to a data structure *per se* held nonstatutory). Such claimed data structures do not define any structural and functional interrelationships between the data structure and other claimed aspects of the invention which permit the data structure's functionality to be realized. *In contrast, a claimed computer-readable medium encoded with a data structure defines structural and functional interrelationships* between the data structure and the computer software and hardware components which permit the data structure's functionality to be realized, and is thus statutory. (Emphasis supplied.)

Therefore, it is submitted that claims 2, 4, 29, 30, 31 and 36 presented herein, which claim a computer readable medium and possess the functional relationships described above, are not directed to an abstract idea but to § 101 statutory subject matter.

Independent claims 46 and 47 claim an information retrieval system that includes a computer readable medium encoded with one or more data structures, including various associations of data, and a computer system programmed to access the medium and cause information stored in the medium, associated as claimed, to be displayed on a display device in response to input from a computer input device. It is submitted that claims 46 and 47 produce a useful, concrete and tangible result, as described in *MPEP* 2106 IV C 2(2). For example, accessing and displaying data is useful and provides a tangible result. Also, the claimed result is concrete, i.e., it is repeatable. To the extent that claims 46 and 47 refer to a computer readable

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[1] The *Computer Desktop Encyclopedia* has the following listing for "data structure": "The physical layout of data. Data fields, memo fields, fixed length fields, variable length fields, records, word processing documents, spreadsheets, data files, database files and indexes are all examples of data structures." Alan Freedman et al., The computer Language Company Inc., Point Pleasant, PA, 2007.

medium encoded with one or more data structures, these claims also recite various associations of data represented by the one or more data structures. Hence, the computer readable medium is itself statutory for the reasons discussed above.

Therefore, it is submitted that claims 46 and 47 presented herein, which claim information retrieval systems that cause data to be accessed and displayed and include a § 101 statutory computer readable medium product, are not directed to an abstract idea but to § 101 statutory subject matter.

Independent claims 50 and 51 are method claims that claim accessing information, using a computer, from a computer readable medium encoded with one or more data structures including various associations of data. The accessed information is stored (associated as claimed) on the medium, accessed and displayed on a computer display device. It is submitted that the methods are statutory in that they satisfy the useful/tangible/concrete test discussed above. To the extent that claims 50 and 51 refer to a computer readable medium encoded with one or more data structures, these claims also recite various associations of data represented by the one or more data structures. Therefore, the computer readable medium is itself statutory for the reasons discussed above.

New independent claims 56 and 57 claim a method of encoding a computer readable medium, which includes associating information and storing it on the medium. It is submitted that the methods of making a product defined in new claims 56 and 57 are statutory under § 101.

It is respectfully requested that all § 101 rejections be withdrawn.

35 U.S.C. §112 Rejections

Claims 2, 4–14, 16–40, and 46–54 were rejected under 35 U.S.C. § 112, ¶ 2, as indefinite. However, the October 20, 2006 Office Action provides no indication of what in these claims renders them indefinite and why. Therefore, Applicants are not in a position to directly address the indefiniteness rejection. However, most pending claims have been amended, and while it is submitted that the claims previously examined satisfy § 112, it is also submitted that the claims as presented herein satisfy § 112.

Nevertheless, claim 12 as amended does not include "its," and claims 2, 4, 29, 31 and 36, as amended, do not include "the encoded information collection."

It is respectfully submitted that all pending claims satisfy § 112 in all respects, and withdrawal of the § 112 rejections is requested.

35 U.S.C. § 102 Rejections

Claims 2, 4-14, 16-29, 46, 47 and 49-53 were rejected under 35 U.S.C. § 102 as being anticipated by the Timothy Arnold-Moore et al. article titled "Databases of Legislation: the Problems of Consolidation" ("Arnold-Moore"). Only the independent claims rejected as being anticipated by Arnold-Moore are discussed in this section. The dependent claims are discussed further below.

Claim 2

Claim 2 claims a computer readable medium encoded with one or more data structures representing an information collection comprising a body of law, where the one or more data structures organize the information collection and facilitate computer access from the computer readable medium of information relating to the body of law, and where the body of law comprises a plurality of topics and a plurality of parts, including parts that are different versions of each other. The one or more data structures are claimed as comprising the following functional relationships:

> an association of each part of the body of law, including different versions thereof, and at least one topic, the association comprising a hierarchical arrangement of topics of the body of law and parts of the body of law in which each part of the body of law and any different version thereof and the associated at least one topic are hierarchically associated;
>
> an association of temporal information comprising one or more dates indicating the legal applicability of a respective part and the legal applicability of any different version thereof and the respective part of the body of law or respective different version thereof; and
>
> an association of information relating to each part and version of the body of law and the at least one topic with which the respective part or version is associated.

Fig. 3 of the application depicts an embodiment of an information collection on which claim 2 reads. The depicted information collection comprises a body of law (e.g., the United States Code) which comprises topics (e.g., titles 24b, chapters 24c, sub-chapters24d, section

headings 26) and parts (e.g., section text 14). Referring to the first association of the one or more data structures claimed in claim 2 and the embodiment of Fig. 3, the topics (e.g., 24b, 24c, 26) are hierarchically associated with the parts (e.g., 14), and each part (e.g., 14a-14n) is hierarchically associated with at least one topic (e.g., 24b, 24c, 26). Referring to the second association of the one or more data structures claimed in claim 2 and the embodiment of Fig. 3, temporal information (e.g., 17 in Fig. 3, page 15, lines 6-10) is associated with each part. Referring to the last association of the one or more data structures claimed in claim 2, information is associated with each part of the body of law and with at least one topic. According to the embodiment represented by Fig. 3, the information in the last association of the one or more data structures of claim 2 may be temporal (as specifically claimed in new claims 58-61), and may be embodied as follows:

> temporal information [is associated] not only with the information units 14 thereof *but also with nodes 24* (except the root node 24a) and nodes 26 of the topic tree. Each information unit 14 and node 24b, 24c, 24d and 26 in FIG. 3 is associated with temporal information 16 or 17 indicating the applicability thereof with respect to time. Thus, in information collection 10 represented in FIG. 3, the visibility of the nodes (except root node 24a) and information units 14 of the topic tree 20b is dependent upon the associated temporal information, and can be accessed based on a date or time period encompassed in the temporal information. (Emphasis supplied.)

(Page 15, lines 6-13.)

Thus, information associated with the topic and the part of the body of law may be temporal information, or other information. For example, referring to Fig. 5 of the application, a node (or TOC) (e.g., 102c) has associated with it information (e.g., Section 1 ... $<S_{1,1}>$ [ ]) relating to a part of a body of law (e.g., 104a).[2] Also, the part of the body of law (e.g., 104a) has associated with it information (e.g., <parent: TOC_Y3>) relating to the node.

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[2] The S.sub.i,j notation is one way to indicate different versions of the same part of the body of law. S.sub.i and S.sub.i+/-1 denote an i.sup.th, and i.sup.th+/-1 part of the body of law. However, because the information collection is dynamic and changes with time, i.e., is date-sensitive, there may be multiple versions (or instances) of a part S.sub.i and S.sub.i+/-1 of the common subject, which will occur when that part changes one or more times. The notation S.sub.i,j is used to denote a j.sup.th version of an i.sup.th section of the particular part.

Timothy Arnold-Moore

Turning now to the Arnold-Moore article, it discusses versioning on page 9 of the article (Section 6). It is submitted that Arnold-Moore's discussion of these various approaches does not disclose all of the associations of the one or more data structures claimed in claim 2.

In Arnold-Moore's description of the approach on page 9, illustrated in Figs. 1a and 1b on page 10, the entire act is stored each time it is modified, and processing is used to obtain desired information. This approach, as described in Arnold-Moore, does not appear to disclose any of the data structure limitations of claim 2. Arnold-Moore's description of the Delta approach on page 11, illustrated in Figs. 1b and 1c on page 10, also does not appear to disclose any of the data structure limitations of claim 2.

In Arnold-Moore's description of the "pruned tree" approach starting on page 11, SGML documents may be treated as trees of elements, and a pruned tree is stored for successive consolidations. Elements that have changed are stored in the pruned tree and elements that have not been changed are marked with a stub in the pruned tree, and can be retrieved from the previous consolidation. An original and pruned trees store the original and changed consolidations. The complete object (or document) history is stored in one (logically) contiguous location in a time-ordered sequence with each version containing its own time-stamp. Arnold-Moore's description of the pruned tree approach does not appear to disclose (1) the hierarchical arrangement defined in the first association of the one or more data structures claimed in claim 2, and (2) the association, defined in the last association of the one or more data structures of claim 2, of information relating to each part of the body of law and the at least one topic with which the respective part is associated.

Arnold-Moore describes still another approach starting at the bottom of page 11. In Arnold-Moore's description of this approach, the database stores the whole history of an act in one file/location. Each element of a specified granularity (e.g. paragraph or section) in the original version created or first valid would be time-stamped from the time of insertion to the default current time. If an element (e.g. a section) was altered at a given time, t, the time stamp on the old element could be changed to be from the time of insertion to time t and a new alternative element could be inserted immediately following the old with a time-stamp t to the

default current time. Arnold-More points out that a major advantage of this approach is that, once a particular consolidation has been retrieved, no extra retrieval is needed to get older or more recent consolidations than the one being viewed. Here again, Arnold-Moore's description does not appear to disclose (1) the hierarchical arrangement defined in the first association of the one or more data structures claimed in claim 2, and (2) the association, defined in the last association of the one or more data structures of claim 2, of information relating to each part of the body of law and the at least one topic with which the respective part is associated.

Arnold-Moore describes a "version skeleton" approach starting in the middle of page 12 and illustrated in Fig. 2, page 13. Arnold-Moore states that in this approach, the power of SGML can be applied to break the consolidation into pieces and store only version skeletons and elements. According to Arnold-Moore, a database is provided of structured text described by a parse grammar (e.g. SGML). Small elements are selected to be atomic nodes or atoms in the database e.g. sections. Each consolidation is stored as a version skeleton or tree, with pointers to all atoms instead of including the atoms in the tree. Each unchanged atom is represented only once (with multiple version trees pointing to the same atom). An altered atom is inserted into the database as a new atom with the alterations performed, and the new version tree points to the new atom. In this approach, according to Arnold-Moore, the level of redundancy depends on the granularity of the amendments and the granularity of the atoms. Arnold-Moore points out that this approach can be made more efficient by storing the atoms for a single act together, and using the version skeleton to point into the collection of atoms, as illustrated in Fig. 3, page 13 of Arnold-Moore. Arnold-Moore states that the simplest way to store the atoms together is to store the SGML text of the original act with additional elements tacked on to the end. If a particular element requires information from lower elements in the tree, a false (F) flag in stored in the tree. A true (T) flag indicates that pointed to element can be used.

Arnold-Moore concludes (starting at the bottom of page 12) that the use of skeletons and atoms (the version skeletons described above) is most attractive from an SGML database perspective. Arnold-Moore describes that the atom is specified as the lowest level referenced by the location encoding. Each version is indexed separately with a location encoding for each occurrence, and the location representation is used to get any 'ancestor' nodes via the version skeleton. A time index on the version skeleton can be maintained independently of the context

index to filter the versions on time. Arnold-Moore points out this scheme can be maintained independently of the context index to filter the versions on time. Arnold-Moore states that this scheme proposes a potentially small size of retrievable units, and points out that retrieval on smaller passages shows increases the effectiveness of retrieval. Atoms can be retrieved directly, and non-atomic elements can be retrieved by retrieving the relevant skeleton and then retrieving only those atoms elements needed for the desired non-leaf element.

Once again, Arnold-Moore's description does not appear to disclose (1) the hierarchical arrangement defined in the first association of the one or more data structures claimed in claim 2, and (2) the association, defined in the last association of the one or more data structures of claim 2, of information relating to each part of the body of law and the at least one topic with which the respective part is associated. It is submitted that the quotation below from the bottom of page 12 to the top of page 14 of Arnold-Moore does not disclose the last association of claim 2, i.e., an association of information relating to each part and version of the body of law and the at least one topic with which the respective part of the body of law is associated. The quotation reads:

> We specify our atom as being the lowest level referenced by our location encoding. We index each version separately with a location encoding for each occurrence and we can then use the location representation to get any 'ancestor' nodes via the version skeleton. A time index on the version skeleton can be maintained independently of the context index to filter the versions on time.

Therefore, it is submitted that claim 2 is not anticipated by Arnold-Moore.

Claim 4

Claim 4 is not anticipated by Arnold-Moore at least because it includes the following limitations that are similar to limitations of claim 2 described above:

> an association of each part of the body of law, including different versions thereof, and at least one topic comprising a hierarchical arrangement of topics of the body of law and parts of the body of law in which each part of the body of law and any different version thereof and the associated at least one topic are hierarchically associated;
>
> an association of information relating to each part or version of the body of law and the at least one topic with which the respective part or version is associated.

Claim 29

Claim 29 claims a computer readable medium encoded with one or more data structures representing an information collection comprising a body of law, where the one or more data structures organize the information collection and facilitate computer access from the computer readable medium of information relating to the body of law. Claim 29 claims that the one or more data structures comprise:

> a plurality of structured documents arranged in a hierarchy of documents comprising documents including a topic or topics of the body of law and documents including a part of the body of law;
>
> an association of each of the documents including a part of the body of law and temporal information comprising one or more dates indicating the legal applicability of the respective-part, wherein a plurality of the parts of the body of law comprises different versions of the same part of the body of law; and
>
> each document that includes a part of the body of law including any different version of that part of the body of law and the temporal information associated with the respective part or version.

An embodiment of claim 29 is illustrated in Fig. 5 of the application, where there is a hierarchical arrangement of documents 107c including topics (e.g., titles, chapters, section headings) and documents 104a-d including parts (sections, i.e., section text), and a separate document 104a, 104b, 104c and 104d for different sections and different versions of sections.

Arnold-Moore does not describe in any approach a plurality of structured documents arranged in a hierarchy of documents comprising documents including a topic or topics of the body of law and documents including a part of the body of law, and separate documents for each different part or version of a body of law, as claimed in the second and last paragraphs of claim 29.

For example, Arnold-Moore in connection with the approaches illustrated in Figs. 1a and 1b, describes that either the entire act is stored each time it is changed, or deltas are stored. In connection with the "pruned-tree" approach discussed in Arnold-Moore starting on page 11, Arnold-Moore does not describe the claim 29 structured document hierarchy comprising

"documents including a topic or topics of the body of law and documents including a part of the body of law."

In connection with the version skeleton approach discussed in Arnold-Moore on page 12, and the bottom of page 12 and top of page 14, and illustrated in Fig. 2 on page 13, and the version skeleton and atoms approach at the bottom of page 12 and illustrated in Fig. 3 on page 13, Arnold-Moore also does not describe the claim 29 structured document hierarchy comprising "documents including a topic or topics of the body of law and documents including a part of the body of law."

Therefore, it is submitted that claim 29 is not anticipated by Arnold-Moore.

Claims 50 and 51

The Office Action bases the rejection of claims 50 and 51 on Sections 1.1 and 1.2 on page 2 of Arnold-Moore. Both of claims 50 and 51 claim a method of accessing an information collection stored on a computer readable medium using a computer coupled to access the information collection, where the medium is encoded with one or more data structures representing an information collection comprising a body of law, and the one or more data structures organize the information collection and facilitate access by the computer system of information from the medium relating to the body of law. The one or more data structures are recited to include the hierarchical arrangement described in the first element of the one or more data structures in claim 2, i.e., an association of each part of the body of law, including different versions thereof, and at least one topic comprising a hierarchical arrangement of topics of the body of law and parts of the body of law in which each part of the body of law and any different version thereof and the associated at least one topic are hierarchically associated.

Each of claims 50 and 51 goes on to define specific method steps for displaying information from the computer readable medium. In claim 50, the method comprises:

> displaying on a computer display device coupled to the computer dates in association with information identifying at least two parts that are different versions of each other; and

> displaying on the computer display device that part of the body of law that is selected with a computer input device coupled to the computer.

In claim 51, the method comprises:

> inputting to the computer using a computer input device the
> identity of a part of the body of law and a date; and

> in response thereto, the computer causing the computer display
> device to display that part whose identity was input to the computer
> and which has temporal information encompassing the inputted
> date.

Sections 1.1 and 1.2 of Arnold-Moore do not describe any display method steps at all, let alone the steps claimed in claims 50 and 51. Also, as discussed above, Arnold-Moore's description of version approaches does not appear to disclose the hierarchical arrangement described in the first element of the one or more data structures in claim 2 (which is also recited in clams 50 and 51). Therefore, it is submitted that claims 50 and 51 are not anticipated by Arnold-Moore.

35 U.S.C. § 103 Rejections

Claims 30-40, 48 and 54 were rejected under 35 U.S.C. § 103 as being unpatentable over Arnold-Moore and WO 01/11559 ("Wiltshire").

Only the independent claims rejected as being unpatentable over Arnold-Moore and Wiltshire are discussed in this section. The dependent claims are discussed further below.

Arnold-Moore has been discussed above. Wiltshire relates to the legal case law domain. Wiltshire is not concerned with a body of law comprising topics and parts of the body of law. Wiltshire relates to automated classification of concepts from court opinions. The passages in Wiltshire cited by the Examiner do not even remotely disclose higher level structured documents, lower level structured documents, or parts of a body of law.

The independent claims rejected under § 103 are claims 30, 31 and 36.

Claim 30

Claims 30 claims a computer readable medium encoded with one or more data structures representing an information collection comprising a body of law, where the one or more data structures organize the information collection and facilitate computer access from the computer readable medium of information relating to the body of law. Claim 30 claims that the one or more data structures comprise:

a plurality of lower-level structured documents;

an association of each of a plurality of parts of the body of law-and temporal information comprising one or more dates indicating the legal applicability of the respective part, wherein a plurality of the parts of the body of law comprises different versions of the same part of the body of law, the temporal information being different for different versions of the same part of the body of law;

each lower level structured document including a different part or different version of the same part of the body of law and including the associated temporal information; and

at least one higher level structured document, each lower level structured document being in a hierarchical relationship with at least one higher level structured document which higher level structured document includes information relating to the respective lower level structured document.

In connection with Wiltshire and the passages cited by the Examiner, page 7, lines 19-23 and page 8, lines 18-23 of Wiltshire discuss notions of concepts, rules of law, areas of law, etc. This is not an association of each of a plurality of parts of the body of law and temporal information comprising one or more dates indicating the legal applicability of the respective part, wherein a plurality of the parts of the body of law comprises different versions of the same part of the body of law, the temporal information being different for different versions of the same part of the body of law claimed in claim 30. In addition, this also is not the plurality of lower-level structured documents, where each lower level structured document includes a different part or different version of the same part of the body of law and the associated temporal information, and at least one higher level structured document, where each lower level structured document is in a hierarchical relationship with at least one higher level structured document, which higher level structured document includes information relating to the respective lower level structured document.

Although page 10, lines 18-27 of Wiltshire refer to a hierarchical (multi-tiered) legal topic scheme, this is a far cry from what is claimed in claim 30, and is not a disclosure of the association of each of a plurality of parts of the body of law and temporal information comprising one or more dates indicating the legal applicability of the respective part, and the lower level and upper level hierarchy discussed above and claimed in claim 30.

Arnold-Moore does not disclose with respect to any approach a plurality of lower level structured documents, each of which includes a different version of the same part of the body of law, and at least one higher level structured document in a hierarchical relationship therewith, where the higher level structured document includes information relating to the respective lower level structured document.

For example, Arnold-Moore in connection with the approaches illustrated in Figs. 1a and 1b, describes that either the entire act is stored each time it is changed, or deltas are stored. In connection with the "pruned-tree" approach discussed in Arnold-Moore starting on page 11, Arnold-Moore does not disclose the claim 30 structured document arrangement and hierarchy discussed above.

In connection with the version skeleton approach discussed in Arnold-Moore on page 12, and the bottom of page 12 and top of page 14, and illustrated in Fig. 2 on page 13, and the version skeleton and atoms approach at the bottom of page 12 and illustrated in Fig. 3 on page 13, Arnold-Moore also does not disclose the claim 29 structured document arrangement and hierarchy discussed above.

Therefore, the combination of Wiltshire and Arnold-Moore does not disclose all of the limitations of claim 30. As a result, it is submitted that the rejection does not make out a prima facie case of obviousness.

The rejection of claim 30 should fail for another reason. It is hard to image how one would combine a classification system for case law (Wiltshire) with an act consolidation disclosure (Arnold-Moore).

Claim 31

Claim 31 is similar to claim 30, except it is directed to an information collection related to a common subject rather than more specifically to a body of law as in claim 30. However, claim 31 defines similar relationships and a similar hierarchy to those claimed in claim 30. Therefore, it is submitted that claim 31 is allowable over Arnold-Moore and Wiltshire.

Claim 36

Claim 36 claims a computer readable medium encoded with one or more data structures representing an information collection comprising a body of law, where the one or more data structures organize the information collection and facilitate computer access from the computer

readable medium of information relating to the body of law. Claim 36 claims that the one or more data structures comprise:

> a hierarchical arrangement of headings in at least one table of contents (TOC) and parts of the body of law, each heading identifying one or more parts of the body of law;
>
> an association of temporal information comprising one or more dates indicating the legal applicability of a respective part of the body of law and the respective part of the body of law;
>
> an association of a plurality of parts of the body of law that are different versions of each other and have different temporal information associated therewith and at least one heading of a TOC; and
>
> an association of the temporal information relating to each part and version of the body of law and each heading with which the respective part or version is associated.

Although the subject matter of clams 2, 4, 29 and 30 differs from that of claim 36, the remarks made with respect to those claims should make clear that the combination of Wiltshire and Arnold-Moore simply do not render claim 36 obvious.

New Claims 56 and 57

Claims 56 and 57 claim methods for encoding a computer readable medium with one or more data structures representing an information collection comprising a body of law, where the one or more data structures organize the information collection and facilitate computer access from the computer readable medium of information relating to the body of law. In claim 56, the method comprises creating in the one or more data structures associations which are recited in claim 2 and storing the one or more data structures in the computer readable medium. In claim 57, the method comprises creating in the one or more data structures the information units, the topical units and the associations which are recited in claim 4, and storing the one or more data structures in the computer readable medium.

As discussed above, the one or more data structures defined in claims 2 and 4 are not disclosed in Arnold-Moore. It is submitted that neither are the methods of claims 56 and 57 for creating and storing the one or more data structures.

Dependent Claims

It is believed that the dependent claims claim patentable subject matter. However, the patentability of such subject matter will not be argued here because the dependent claims incorporate the subject matter of at least one independent claim and therefore would be allowable based on the allowability of the respective independent claim(s). However, Applicants reserve the right to argue and rely on the subject matter of the dependent claims for patentability in this or a subsequent proceeding.

Closing

For at least the reasons discussed, the Applicants respectfully request allowance of all claims presented herein. Applicants do not agree with or acquiesce in any ground of rejection that may not have been specifically rebutted herein, and it is believed that sufficient reasons have been provided for allowance of all claims.

To expedite prosecution of this application, the Examiner is requested to let Applicants' undersigned representative know when the Examiner would be available for an interview prior to the Examining issuing another office action rejecting any claim.

Respectfully submitted,

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